



NOAA
FISHERIES

Office of
International
Affairs, Trade,
and Commerce

U.S. Seafood Import Monitoring Program

Southeast Asian Fisheries Development Center
(SEAFDEC): Regional Training on Traceability
and Effective Management Tools
June 2025

Overview

- NOAA Fisheries role in the whole-of-government approach to address IUU fishing
- NOAA Fisheries seafood trade monitoring programs
- SIMP implementation and history
- Program requirements
- NOAA Fisheries use of the SIMP harvest data collected
- Moving forward

NOAA's role in addressing IUU fishing

NOAA is a co-chair of the 21-member U.S. Interagency Working Group on IUU fishing.

NOAA Fisheries' Focus:

- Keeping IUU fish and fish products out of U.S. markets
 - Seafood trade monitoring programs
 - Moratorium Protection Act
- Strengthening global marine stewardship
 - International and regional fisheries management organizations
- Helping nations build monitoring and enforcement capacity
 - Technical assistance



NOAA Fisheries seafood trade monitoring programs

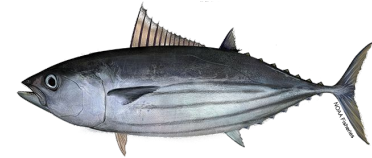
Antarctic Marine Living Resources Program

Highly Migratory Species International Trade Program

Seafood Import Monitoring Program

Tuna Tracking and Verification Program

Certification of Admissibility requirements under seafood import restrictions



What is the Seafood Import Monitoring Program?

The Seafood Import Monitoring Program (SIMP) establishes permitting, reporting, and recordkeeping requirements for imports of thirteen seafood species groups, to combat illegal, unreported, and unregulated-caught and/or misrepresented seafood from entering U.S. commerce.



The 1,100 unique species included in SIMP, categorized in 13 species groups, have been identified as particularly vulnerable to IUU fishing, seafood fraud, or both.

SIMP covers about 32% of all seafood imports into the United States.

SIMP origins: Presidential Task Force

Joint U.S. Government Task Force tasked with developing recommendations for implementation of a comprehensive framework of integrated programs to combat IUU fishing and seafood fraud.

Recommendations included developing a **traceability program**, which was implemented through a transparent public engagement process on all aspects of the program, including:

- types of information and operational standards
- identifying current at-risk species of IUU fishing and fraud
- data collection and determining gaps
- evaluation and further implementation



At-risk principles for species selection

Enforcement capability

Species misrepresentation

Catch documentation scheme

History of fishing violations

Complexity of the chain of custody and processing

Mislabeled or other misrepresentation

Human health risks



Species/ species groups covered by SIMP

Species*

Atlantic Cod
Blue Crab (Atlantic)
Dolphinfish (Mahi Mahi)
King Crab (Red)
Pacific Cod
Red Snapper (Northern)
Swordfish

Species Groups*

Abalone
Grouper
Sea Cucumber
Sharks
Shrimp
Tunas (Albacore, Bigeye, Bluefin,
Skipjack, Yellowfin)



**Includes more than 1,100 unique species.*

SIMP objective & constraints

SIMP was originally designed to deter products harvested via illegal, unreported, and unregulated (IUU) fishing and mislabeled fish products from the U.S. market and to identify such products.

Program Constraints:

- Limitation to use only the Automated Commercial Environment (ACE) to report harvest and landing data,
- Lawful trade should not be stopped, and
- Use of Magnuson-Stevens Fishery Conservation and Management Act provision that prohibits import of fish taken in violation of a foreign law.

SIMP is...

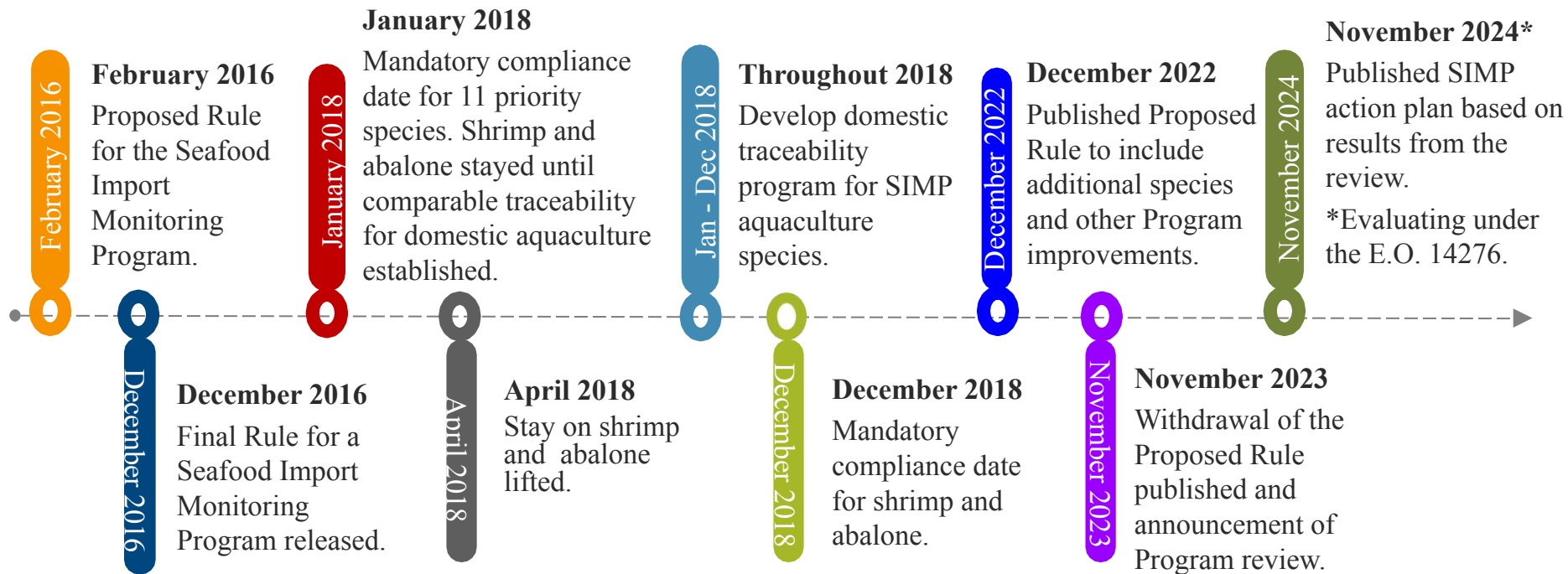


... a risk-based screening tool for detecting IUU fishing and fraud in the seafood supply chain and deters products harvested via IUU fishing and mislabeled fish products from entering the U.S. market.

... industry facing, expecting U.S. importers to exercise increased control over their supply chains by requiring them to retain Chain of Custody information for all imports of covered species, from harvest through import.

... designed to not impede legitimate trade flow, balancing combating IUU fishing with minimizing impacts to legitimate business.

Timeline of SIMP implementation



Program requirements

The U.S. importer is required to:



Obtain a NOAA
Fisheries
International
Fisheries Trade
Permit



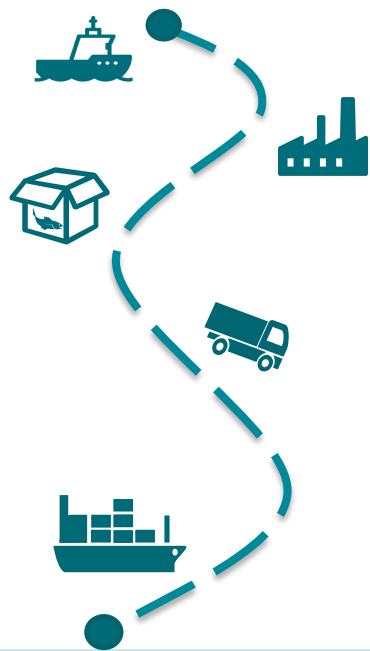
Report certain harvest and
landing information upon
import in Customs'
Automated Commercial
Environment



Retain chain of
custody records for
two years, and share
in the event of an
audit

Harvest & landing data reported to SIMP

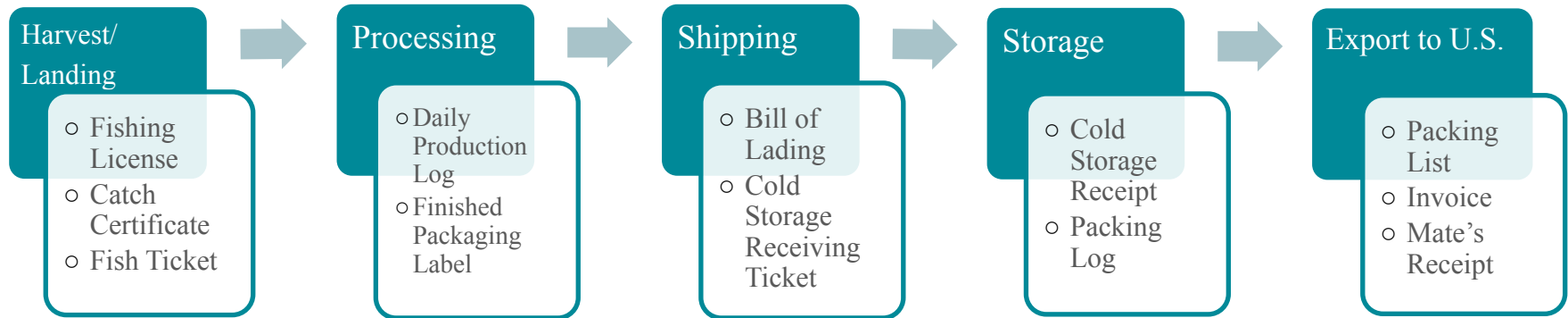
Data reported identify each harvest event, landing, and the details of first recipient for the product upon U.S. import. U.S. importers are required to report the:



- Species
- Type of harvest (e.g., wild-capture, farm)
- Country of harvest
- Gear type
- Landing date
- Product form (e.g., whole)
- Authorization to fish or run aquaculture operation
- Name of harvesting vessel
- Vessel Country of Registry
- Unique vessel identifier (if applicable)
- Harvest weight at landing
- Country of first landing, delivery location, and/or place of transshipment
- First recipient to which the fish was landed or delivered (name, address, and entity role, such as the buyer or processor)

Harvest & Landing Records Required by SIMP

Chain of custody records should identify the product, any transformations, and each custodian at every step along the supply chain to U.S. import.



Above records are examples of a typical supply chain.

Small-Scale Harvest Accommodation



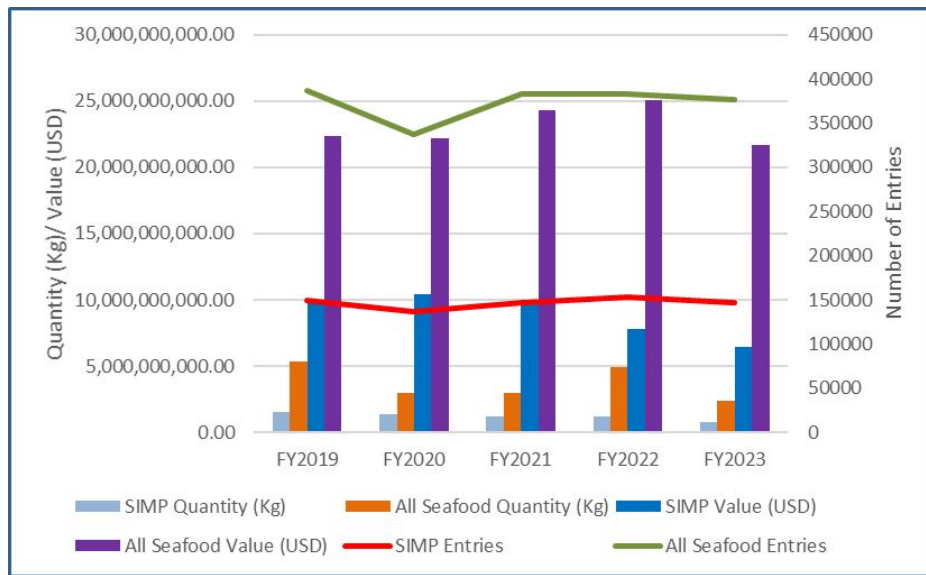
Definition

- Fishing Vessels ≤ 12 meters in length or ≤ 20 gross tons
- Aquaculture deliveries $\leq 1,000$ kg

Multiple small-scale deliveries to one collection point in one day can be consolidated in an Aggregated Harvest Report:

- Not required: Individual vessel or farm name
- Required: Number of deliveries and all other data elements

U.S. seafood imports (FY 2023)



All seafood
imports

2.4B KG

\$21.7B

377,000

entries

SIMP
imports

773M KG

\$6.5B

147,000

entries

Global Seafood Data System (GSDS)

Objective: ensuring legitimate trade while deterring IUU fishing

We seek to achieve these goals by:

- 1) automating reporting and analytics, and
- 2) recognizing risk by identifying trends, anomalies, and potential trade monitoring issues



GSDS project timeline

2021	2022	2023	2024	2025
Phase I: demonstration project successful	Phase II: development began	Completed the reporting and analysis module	Implemented the automated screening for all SIMP entries	Implement the SIMP action plan

Functional impacts

Respond to Policy Priorities

- NOAA Fisheries is able to quickly develop and deploy flags to respond to current events
- Risk flags can integrate additional NOAA data sources

Able to Integrate Insights from Historical Trends

- Risk flags can steer audits away from historically compliant policy categories and towards higher risk entries
 - Fewer audits of Farmed Shrimp
 - More audits from Small Vessel Harvest entries

Enabling Future Capabilities

- Integrating the analytic environment with the audit selection process enables future AI/ML capabilities
- Proof of concept using natural language processing to link open-text fields with reported HTS codes



Baseline data quality validations: ensure data quality and consistency

All SIMP entries are automatically screened with baseline validations such as:

- Invalid codes reported for the species (FAO) and country of harvest (ISO)
- Harvest dates are in the future (before import)
- Species is appropriate to its HTS code description
- Any required data elements not present

Entries that fail these checks are more likely to be audited



Programmatic risk rules: target high risk shipments in line with policy objectives

Entries are screened for elements indicative of lower or higher risk and mandated by the National Defense Authorization Act of FY23. Entries are assigned points based on the risk rule, as appropriate.

High Risk

- Entries that receive high risk tags are **more likely to be audited** if they align with certain policy objectives.
- Examples include:
 - Country of harvest identified under the Moratorium Protection Act, Trafficking in Persons report, and List of Goods Produced by Child Labor or Forced Labor
 - Wild-caught shrimp from a country not certified under the Sec 609 Program

Low Risk

- Entries that receive low risk tags are **less likely to be audited** if they align with certain policy objectives.
- Examples include:
 - Entries of farmed whiteleg shrimp from Indonesia, Thailand, and Vietnam
 - Entries also subject to the Highly Migratory Species International Trade Program

Moving Forward

- Continue implementation of the SIMP action plan
- Improve risk analysis by using technology to identifying trends, anomalies, and potential trade monitoring issues



Contact Information & Resource



Email: SIMPsupport@noaa.gov

Phone: 833-440-6599 (toll free)

Hours: Monday – Friday, 8 am – 5 pm (ET)

SIMP Resources Online (including explanatory videos):

<https://www.fisheries.noaa.gov/international/seafood-import-monitoring-program>

Email for other NOAA Fisheries trade programs and import restrictions:

trademonitoring.support@noaa.gov

NOAA Fisheries Seafood Import and Export Tool:

<https://www.fisheries.noaa.gov/seafood-import-export-tool>